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July 4, 2024

Via Email

David M. Giglio, Esq.
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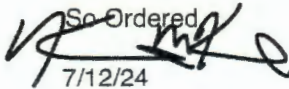
Re: In Re: New York Tax Foreclosure Surplus Litigation
MDL Docket No.: 3117

Dear David:

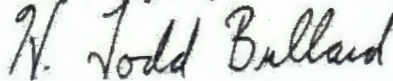
As attorneys for multiple Defendant Counties in the entitled non-class actions set forth in Addendum A annexed hereto, on behalf of those Defendant Counties, we recommend that based on the experience in *Steele et al v. Saratoga County et al*, Case No. 1:23-cv-1615 (N.D.N.Y.), where my firm represents six named Defendants, that the discovery for our actions be orderly, efficient and conducted in the context of the pending motion to transfer and consolidate before the United States Judicial Panel On Multidistrict Litigation MDL. As you know, the motion argument for the MDL proceeding is July 25, 2024. In light of the MDL motion, we propose that all discovery in the pending matters listed on Addendum A, where your firm represents the Plaintiffs, be stayed until after resolution of the MDL motion referenced above.

Please indicate your consent and concurrence to the proposal by signing below.

Granted.

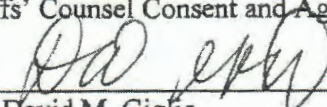
So Ordered

7/12/24

Very truly yours,



H. Todd Bullard

Plaintiffs' Counsel Consent and Agreement to proposal by Harris Beach PLLC

By: 
David M. Giglio

HTB:kam
Encs.